

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ABBY CHAMPION, ALANNA ARRINGTON,	:
AMBAR CRISTAL ZARZUELA MONTERO,	:
ANNA CLEVELAND, ANOK YAI, BLANCA	Case No.: 1:20-cv-07255-LAK
PADILLA, BRIONKA HALBERT, BROOKE	:
ROBINSON, CALLUM STODDART, CARA	:
TAYLOR, CLAIRE DELOZIER, CYNTHIA	:
ARREBOLA, DAMIEN MEDINA, DYLAN	:
CHRISTENSEN, EMILY REBECCA HILL p/k/a	:
EMI RED, ENIOLA ABIORO, GEORGINA	:
GRENVILLE, GRACE ELIZABETH HARRY CABE	:
p/k/a GRACE ELIZABETH, GRACE HARTZEL,	:
HIANDRA MARTINEZ, JAL BUI, JOÃO KNORR,	:
KRISTIN LILJA SIGURDARDOTTIR p/k/a	:
KRISTIN LILJA, LEONA WALTON p/k/a BINX	:
WALTON, LINEISY MONTERO, LUCIA LOPEZ	:
AYERDI p/k/a LUCIA LOPEZ, LUISANA	:
GONZALEZ, MANUELA MILOQUI p/k/a MANU	:
MILOQUI, MARIA VITORIA SILVA DE	:
OLIVEIRA p/k/a MARIA VITORIA, MARIAM	:
URUSHADZE p/k/a MARISHA URUSHADZE,	:
MAUD HOEVELAKEN, MAYA GUNN, MYRTHE	:
BOLT, RACHELLE HARRIS, ROCIO MARCONI,	:
SARA EIRUD, SELENA FORREST, SHUPING LI,	:
TANG HE, UGBAD ABDI p/k/a UGBAD, VERA	:
VAN ERP, VIKTORIIA PAVLOVA p/k/a ODETTE	:
PAVLOVA, XIAOQIAN XU,	:
Plaintiffs,	:
-against-	:
MODA OPERANDI, INC., ADVANCE	:
PUBLICATIONS, INC. d/b/a CONDE NAST,	:
ADVANCE MAGAZINE PUBLISHERS, INC. d/b/a	:
CONDE NAST,	:
Defendants.	:

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DECLARATION OF CLAIRE DELOZIER

Claire DeLozier declares pursuant to 28 U.S.C. § 1746:

1. I am Claire DeLozier, a plaintiff in this action. This declaration is made in opposition to defendants' respective motions to dismiss my claim under New York Civ. Rights Law §§ 50, 51.

2. I am a professional model.
3. I am signed to, among others, Next New York.
4. I have read the Declaration, dated February 5, 2021, of Faith Kates on behalf of Next Model Management, LLC, and I affirm that all of the paragraphs that refer to me are accurate.
5. My modeling career is centered in New York and a large portion of my modeling jobs occur in New York. It is where I am best known as a model.
6. While I used to live with my parents in Florida, I currently live in New York City.
7. I believe that my property rights in my image, personality and reputation are most strongly connected to New York.
8. For the foregoing reasons, defendants' motions to dismiss my claims under the New York Civil Rights Law should be denied.

Dated this 5 day of February, 2021



CLAIRES DELOZIER